

EXHIBIT 2

Interconnection **Agreement** Excerpted Pags
with **Definition** of End User

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Andrew M. Jones
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Southwestern Bell



August 16, 2001

Commission Filing Clerk
Public Utility Commission of Texas
1701 N. Congress Avenue
Austin, Texas 78701

RE: Docket 24363 Joint Application of Southwestern Bell Telephone Company and El
Paso Networks, LLC for Approval of Amendment to Interconnection Agreement
under Public Utility Code Act of 1996

Dear Filing Clerk:

In response to Order No. 2, Approving Amendment to Interconnection Agreement, issued August 10, 2001, attached is the complete amended interconnection agreement between Southwestern Bell Telephone Company and El Paso Networks, LLC.

Please do not hesitate to call me if you have any questions regarding this matter.

Sincerely,

Andrew M. Jones
Attorney

cc: Dennis Price, Vice President for El Paso Networks, LLC (overnight delivery)
General Counsel, PUC (hand delivered)
Central Records, PUC (hand delivered)

INTERCONNECTION AGREEMENT-TEXAS

between

Southwestern Bell Telephone Company

and

El Paso Networks, LLC

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BETWEEN
SOUTHWESTERN BELL TELEPHONE COMPANY
AND
El Paso Networks, LLC

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obligation for either Party. A defined word intended to convey its special meaning is capitalized when used. Other terms that are capitalized and not defined in this Agreement will have the meaning in the Act. The following terms have been defined through arbitration:

- 53.2 "Central Office Switch" means a switching system within the public switched telecommunications network, including the following:
- (i) "End Office Switches" which are switches where end user Exchange Services are directly connected and offered; and
 - (ii) "Tandem Office Switches" or "Tandems" which are switches used to connect and switch trunk circuits between Central Office Switches. Central Office Switches may be employed as combination End Office/Tandem Office switches.
- 53.3 "Collocation" means an arrangement whereby one Party's (the "Collocating Party") facilities are terminated in its equipment necessary for Interconnection or for access to Network Elements on an unbundled basis which has been installed and maintained at the premises of a second Party (the "Housing Party"). Collocation may be "physical" or "virtual." In "Physical Collocation," the Collocating Party installs and maintains its own equipment in the Housing Party's premises. In "Virtual Collocation," the Housing Party installs and maintains the collocated equipment in the Housing Party's premises. Collocation includes, but is not limited to, collocation of 38 GHz basic transmission equipment, provided it complies with the guidelines in SWBT's current Physical Collocation Technical Publication provided to CLEC. CLEC may collocate, "physically" or "virtually", remote switch modules (RSMs) in SWBT's central offices. CLEC may not collocate switching equipment in SWBT's central offices without SWBT's consent.
- 53.4 "Common Channel Signaling" or "CCS" is a special network, fully separate from the transmission path of the public switched network that digitally transmits call set-up and network control data. The parties hereby agree that an ISDN D-Channel, which unlike SS7, utilizes transmission paths of the public switched network to digitally transmit call set-up and network control data is a method of interconnecting "CCS" type information.
- 53.5 "End User" means a third-party residence or business, that subscribes to Telecommunications Services provided by either of the Parties, or by another telecommunications service provider or any other entity that is treated as an "End User" by Commission or FCC rules.
- 53.6 "Enhanced service" means voice mail, Internet service, and tele-messaging services and other services both parties mutually agree are enhanced services.
- 53.7 "Enhanced Service Provider" ESP's include but are not limited to voice mail companies, Internet Service Providers and tele-messaging companies.

- 53.8 Intentionally left blank by parties.
- 53.9 "Internet Service Provider (ISP)" is any person or entity that provides the ability for end users to access the features, functions and information available over the Internet (internet access) using the public switched telephone network.
- 53.10 "Interconnection Activation Date" is the date that the construction of the joint facility Interconnection arrangement has been completed, trunk groups have been established, and joint trunk testing is completed.
- 53.11 "Local Traffic," for purposes of intercompany compensation, is if (i) the call originates and terminates in the same SWBT exchange area; or (ii) originates and terminates within different SWBT Exchanges that share a common mandatory local calling area, e.g., mandatory Extended Area Service (EAS), mandatory Extended Local Calling Service (ELCS), or other like types of mandatory expanded local calling scopes. Local traffic includes traffic to or from enhanced service providers.
- 53.12 "Remote Switching Module" means a telecommunication device which connects to a host switch by DS-1, DS-3, Dark Fiber, or other transmission media. Remote Switching Modules include but are not limited to, Siemens ESWD RCUs and DLUs.
- 53.13 "Special Request" means the process described in Appendix UNE that is attached hereto and incorporated herein that prescribes the terms and conditions relating to a Party's request that the other Party provide a Network Element as that term is identified in Attachment 6.

54.0 Resale

- 54.1 At the request of CLEC, and pursuant to the requirements of the Act, any telecommunications service that SWBT currently provides or hereafter offers to any customer in the geographic area where SWBT is the incumbent LEC will be made available to CLEC by SWBT for Resale in accordance with the terms, conditions and prices set forth in this Agreement. Specific provisions concerning Resale are addressed in Attachment 1: Resale, and other applicable Attachments.

55.0 Unbundled Network Elements

- 55.1 At the request of CLEC and pursuant to the requirements of the Act, SWBT will offer in the geographic area where SWBT is the incumbent LEC Network Elements to CLEC on an unbundled basis on rates, terms and conditions set forth in this Agreement that are just, reasonable, and non-discriminatory. Specific Provisions concerning Unbundled Network

08/14/01

EXHIBIT 3

Affidavit of Pantios Manias

DOCKET NO. 26904

COMPLAINT OF SOUTHWESTERN	§	
BELL TELEPHONE, LP FOR POST	§	PUBLIC UTILITY COMMISSION
INTERCONNECTION AGREEMENT	§	
DISPUTE RESOLUTION WITH	§	OF TEXAS
EL PASO NETWORKS, LLC	§	

EL PASO NETWORKS, LLC
RESPONSE, COUNTERCLAIM, AND REQUEST FOR AN INTERIM RULING

AFFIDAVIT OF PANTIOS MANIAS

Pantios Manias, being duly sworn upon oath, deposes and states as follows:

1. My name is Pantios Manias. I ~~am~~ **Senior** Vice President for Carrier Relations, Regulatory and Business Development for El ~~Paso~~ Global Networks ("EPGN"), the parent ~~com-~~pany of El Paso Networks, L.L.C. ("EPN"). Prior to joining El Paso I worked for over four years at Southwestern Bell Telephone Company ("**SWBT**") in Texas. I began working at SWBT in 1996 ~~as~~ a Manager in the Network organization. In 1997 I moved to a position ~~as~~ a Special Access Account Manager selling Special Access to Wireless **Carri-**ers, and in my last position with SWBT I served as a CLEC Account Manager.
2. In my position at EPGN I ~~am~~ responsible for maintaining relations with the other telecommunications carriers, including incumbent LECs with whom EPN does business. For example, I am responsible for managing the negotiations of interconnection agreements and the day to day interaction between EPN personnel and SWBT. I also have knowledge of EPN's relationship with its customers and ~~am~~ frequently involved in negotiating deals with customers that ~~seek~~ to obtain telecommunications services from EPN.

3. The ~~purpose~~ of my affidavit is to demonstrate that if **SWBT** is allowed to withhold access to wireless carrier Cell Sites ~~as~~ UNEs, EPN will ~~suffer~~ irreparable harm and be precluded from provisioning scheduled service to its customer. Namely, EPN will lose the ability to serve wireless carrier customers, will suffer irreparable damage to its business reputation for providing timely service, and will lose its ability to compete in a meaningful way to provide telecommunications services ~~to~~ customers in Texas.
4. In ~~this~~ affidavit, I will first discuss EPN's orders for ~~UNE~~ **DSL** loops to cell sites. In ~~this~~ section of my affidavit I will: describe how EPN submitted the orders to SWBT; show that EPN provided SWBT information indicating the orders were for a wireless carrier and for circuits to that ~~carrier's~~ cell sites; explain SWBT's policy that ~~requires~~ EPN to obtain such circuits ~~as~~ loops; show that pursuant to that policy, EPN has ordered **DSL** and other loops to telecommunications carrier locations; and explain how **SWBT's** internal systems are set up to recognize such locations ~~as~~ loop addresses. Then my affidavit will show how SWBT's action precludes EPN from providing scheduled service to its wireless customer and to other wireless customers that wish to do business with EPN.
5. EPN is in the market to provide high-speed telecommunications transport services ~~to~~ telecommunications carriers and high-volume business users. To serve the needs of these customers, EPN has deployed a state of the ~~art~~ transport network in five cities in Texas: **Austin**, San Antonio, Dallas, Houston and ~~Fort~~ **Worth**. EPN ~~has~~ now completed its transport network, has collocated in most of **SWBT's** central offices in each of these five cities, and has connected these offices using dark fiber obtained from SWBT. EPN is now mostly focused on attracting customers to its transport network. To reach these cus-

tomers, EPN must have access to UNEs between EPN's collocation arrangements in SWBT central offices and the customer's premises.

A. EPN's UNE DS1 Loop Orders for A National Level Wireless Carrier Customer Cell Sites

6. Between May 7, 2002, and June 27, 2002 EPN submitted 83 orders for DS1 UNE Loops to serve cell sites in Texas for a national level wireless customer. SWBT provisioned all 83 of these DS1 loops. During the ordering process, EPN discovered that SWBT's Operations Support Systems, in some cases, contained a different street address for the cell sites than the address that the wireless customer provided to EPN. The reason for this difference between the address the wireless carrier provided EPN and the address in SWBT's OSS is that wireless carriers frequently assign street addresses to their cell sites simply for the purpose of obtaining a telecommunication service to its cell towers that are generally located at a vacant lot or some other obscure area (so the tower remains unobtrusive). In other words, cell sites are often located on property that lacks a standard street address. In order to ensure that the order flows through SWBT's OSS, the SWBT engineer who initially designs the original circuit would work with the wireless carrier's cellular engineer to designate an address for use in the internal SWBT systems. Most of the time the wireless carrier engineer would have an idea of how the cell site should be addressed, although, in the past, it did not need to be an exact science. Although EPN's customer (the Wireless Carrier) provides EPN with the purported street addresses for its cell site where it is requesting EPN provide service, there is generally no way for EPN to retrieve the precise address information that was used in the SWBT systems. The older

cell sites present ~~greater~~ difficulty in **ascertaining** the ~~street~~ address SWBT has assigned to that site. For recently deployed **cell** sites, the ~~task is~~ easier because in order to include E-911 capability the wireless **carriers** must provide precise addresses for their newly deployed cell towers.

7. Of the 83 orders that SWBT eventually provisioned for EPN, there were approximately twelve (12) orders where the address EPN's wireless carrier customer provided to EPN differed from the address residing in SWBT's OSS. For these 12 orders where there was an address discrepancy, EPN's wireless ~~carrier~~ customer provided EPN a circuit number **identifying** an existing circuit that SWBT had provisioned to the same cell site, thus allowing SWBT to locate the assigned address in their ~~system~~, change the address on the EPN **service** order and provision the order to install the **DSI** loop. EPN personnel **also** discussed the address with SWBT personnel in the Local Service Center ("**LSC**"). Exhibits 10-12 show EPN's provisioning notes that reflect what information EPN provided SWBT.² For instance, exhibit 10 shows that for the particular order, the SWBT **LSC** representative, Charity **King**, was aware that the loop was to a cell site located on a water tower? SWBT was obviously aware the customer was a wireless carrier, **as** the ~~cus-~~tomers' name was on each **LSR**, and on at least four orders EPN clearly identified the customer **premises** was clearly marked **as** a *carrier* cell site. For example, Exhibit 6 shows that EPN submitted a **LSR** to **SWBT**, explaining in the **Remarks** field of the con-

EPN Provisioning Notes Order Q 2525, p. 2 of exhibit (indicating customer care at SWBT request for EPN to "add roof to address info"); EPN Provisioning Notes Order Q 2214, p. 6 of exhibit ("requesting circuit to go to cell site").

²

EPN Provisioning Notes Order Q 2234, attached as Exhibit 10, page 2 of exhibit.

tact section on the **LSR** that “**this** location is a cell **site**.”³ Consistent with its policy, **SWBT** provisioned the loop, and even after EPN submitted that order, provisioned other orders from EPN for the same customer. In another **LSR**, EPN noted that the customer premise is ‘located ~~at~~ the cell **site**.’⁴ Other EPN **LSRs** identified the premises as “cell **site**.”⁵ Further, when working together to resolve address conflicts, EPN informed **SWBT** personnel that the locations were cell sites. After EPN informed **SWBT** that the customer locations were cell sites, **SWBT** continued to provision EPN’s orders. This was consistent with **SWBT**’s policy at all times. In addition, other orders in the group of 83 that **SWBT** provisioned were, at some point in the ordering process either rejected or jeopardized due to no facilities available. On at least one of these occasions, **SWBT** rejected the order after it had already provided EPN with a **firm** order confirmation, but a **SWBT** outside plant technician had visited the field to install the circuit and found no facilities available.⁶ It is likely that after its technician made a field visit in an attempt to install the loop, **SWBT** knew that the customer premise was a cell site. **SWBT** clearly possessed information that the **DSL UNE** loops EPN ordered for **this** customer were cell sites, yet **SWBT** continued to provision EPN’s orders.

8. On approximately September 23, 2002, **SWBT** ceased its prior practice of assisting EPN to resolve the address conflicts between the EPN customer provided address and the ad-

³ EPN LSR for PON Number 1ULQ2017 attached as Exhibit 6; ~~Marias~~ Affidavit ¶ 7.

⁴ EPN LSR for PON Number 1ELQ02226, attached as Exhibit 7.

⁵ EPN LSR for PON Number 1ULQ02228, attached as Exhibit 8; EPN LSR for PON Number 1ULQ02214, attached as Exhibit 9.

⁶ **SWBT** ultimately performed the necessary work to make access to the **UNE** available to EPN.

dress resident in SWBT's OSS. **SWBT's** October 11, 2002 letter to EPN was the first **time** **SWBT** took the new and **stark** position that loops to a cell site are not UNE loops. Given this policy change, **SWBT refused** to provide the needed address data that would allow EPN to enter the orders into the **SWBT** provisioning system. EPN currently **has 26** customer orders **where** **SWBT** refuses to assist EPN in verifying these addresses **and** **refuses** to provision for EPN. EPN **has even** taken the extraordinary step of obtaining a Letter of Authorization ("LOA") from EPN's wireless carrier customer which specifically **grants** EPN the authority to **act and** request information on the customer's behalf. For example, the LOA grants EPN the right to request address verification information **from** SWBT's **Local Service Center** ("LSC") but **SWBT** still refuses to provide EPN this information. **SWBT** absolutely **refuses** to verify the addresses for these orders

9. **SWBT's** position that facilities between the **main** distribution **frame** and the customer's premises **are** not loops when the customer premises is a cell site is inconsistent with SWBT's practice and operations before the current dispute. Before **SWBT** stopped verifying addresses on EPN's orders in September, 2002, **SWBT** provisioned 83 DS1 UNE loops to cell site for EPN. In addition, prior to September 23, 2002, when the wireless carrier customer provided EPN an **address** that had the correct address and EPN then submitted the **service** order through **SWBT's** OSS system, the service order flowed through **SWBT's** system and **SWBT** installation personnel provisioned the circuit **as** a UNE loop without **a** problem. In other words, **SWBT has** designed its Operational Support **Systems** to recognize cell sites **as** a loop address. Further, **SWBT's** Plant Location Records ("PLRs") make no distinction between a cell site and any **other** loop address.

Similarly other **SWBT** provisioning systems, such as FACS and TRKS, do not differentiate cell sites from other loop addresses.

10. In **fact**, the basic network architecture of a wireless network configuration dictates that the facility between the **SWBT** central office and the cell site is a loop. Importantly, in urban areas, cell sites are ~~often~~ (if not mostly) located atop multi-tenant buildings and not separate cell towers. These building-based cell sites are served by the same DS-1 loop configuration used by every other DS-1 customer in the building. There simply is no difference. Included with EPN's pleading as Attachment 4 is a basic diagram that shows how EPN **uses** DSI ~~UNE~~ loops to **connect** wireless carrier cell sites to the rest of the wireless carrier's network.
11. **SWBT's** position that DS1 facilities are not available as DS1 UNE loops appears to be a reversal of **SWBT's** policy, under the **Waller Creek/EPN Interconnection Agreement**, of forcing EPN to purchase loops rather than ~~entrance~~ facilities to carrier locations where there is no carrier switch present. Under the existing agreement, **SWBT** has required EPN to order such loops and that is how **SWBT's** OSS handles such requests. EPN can not order such circuits as entrance facilities because **SWBT's** OSS is programmed to ~~reject~~ UDT entrance facility service orders that do not include a switch CLI code. Likewise, pursuant to **SWBT's** current pricing, DSI UNE loops and DS1 UNE entrance facilities are the same price? EPN has, over the course of the existing Agreement, obtained many DS1 and **DS3** loops to its telecommunications carrier customer locations.

¹ T2A Appendix Pricing Schedule of UNE Prices April 16, 2001.

SWBT **has** never before **rejected** a UNE loop order on the sole basis that the customer being **served** by the loop was a telecommunications carrier.

B. EPN Will Be Harmed Without Access to UNEs from SWBT to Wireless Carrier Cell Sites

12. Generally, Commercial Mobile Radio Service (“CMRS”) or wireless carriers establish a location called a Mobile Telecommunications Switching Office (**“MTSO”**) that provides “entrance facilities” to a SWBT central office. From the SWBT central office, the channel ~~terminations~~/loops connect to individual cell sites in a metropolitan area. Interestingly, most of ~~the~~ wireless network is carried over wireline facilities. From my discussions ~~with~~ wireless carrier customers I believe that SWBT currently provides ~~over~~ **85%** of the transport that wireless carriers use in their network. **These ILEC** wireline facilities connect the cell towers to the MTSO, which then transmits the calls on to the Public Switched Telecommunications Network (“PSTN”). The only wireless connection is ~~from~~ the cell site or tower to the caller’s mobile phone.
13. **When** a CMRS carrier expands its network to a new territory, it needs to establish multiple cell sites to ensure ~~that~~ its customers *can* have a continuous wireless connection **as** they travel. For instance, **as** a caller travels on **1-35** from Austin to Waco, the cellular connection is passed or “**handed off**” from one cell site to the next **as** the cellular customer travels down the highway. As **another** example, a single carrier operating in the Dallas-Fort Worth area would need to install approximately **400** to **450** separate cell sites to provide thorough coverage of that area. Similarly, Houston **requires** approximately 400 cell sites; San Antonio **and** Austin each would need between **180** and 200 sites. **De-**

pending on the technology ~~used~~, generally the wireless carrier will request one or two DS1 ~~connections~~ back to the ILEC wire center ~~from~~ each cell site it ~~installs~~. That bandwidth requirement will increase as wireless carriers upgrade their wireless networks and add additional features and applications such as transmitting digital pictures to their consumer products.

14. In order to meet the wireline telecommunications transport needs of the wireless carrier, a telecommunications provider must be able to provision telecommunications services to each cell site in the wireless provider's footprint. Logically, this requires that the telecommunications carrier have access to a ubiquitous network that covers the entire footprint and has the economy of scope and scale that makes deploying facilities to reach the cell sites economically feasible. The only carrier with that network is the ILEC, whose network was built using ratepayer dollars during the era when the ILEC had a state sanctioned and guaranteed monopoly, thus ensuring that it would always have customers to use the facilities it deployed and those customers would pay the ILEC rates set by regulators that virtually eliminated any risk of stranded investment. Even for new deployment of cell towers the sites are largely in already populated areas (where there are existing and potential wireless subscribers and thus demand for service). In many cases SWBT will have existing backbone and feeder cables in place and only needs to add the last portion of cable to connect the existing backbone or feeder cable to any new lateral cable that it must deploy to reach the new cell site. Thus, the ILEC is the only carrier that can economically deploy such facilities because the facilities simply expand the existing ubiquitous network the ILEC already has placed in the ground.

15. In order for a CLEC to compete for ~~this~~ business, because of the low volume of circuits ~~required~~ to serve each individual cell site and the large number of locations in each metropolitan area, the ~~CLEC~~ *can* not serve the Wireless Carrier customer without access to ~~UNEs~~.
16. ~~This~~ market is an ~~important~~ market ~~as~~ wireless subscriber levels increase. As demand for wireless service ~~increases~~ ~~carriers are~~ constantly adding capacity and expanding their network. ~~In~~ order to bring new and better services to their customers in Texas and at the same time lower prices, wireless ~~carriers~~ need to reduce their ~~costs~~. Since a large chunk of their ~~costs~~ are special access ~~fees~~ paid to SWBT, it is only logical that the ~~carriers are~~ looking to CLECs ~~as~~ potential ~~sources~~ of supply for the inputs that are critical to the ~~vi-~~ability of the service they provide Texas ~~consumers~~. The absence of competition in ~~this~~ regard will likely effect the quality of the wireless service and the price ~~consumers~~ pay for such service in the state of Texas. There are currently six large cellular providers in the major market ~~areas~~ of Texas: Verizon Wireless, AT&T Wireless, Cingular, T Mobile (formerly VoiceStream), Nextel and Sprint PCS. In the tier one cities of Texas: Austin, San Antonio, Dallas, ~~Fort~~ Worth and Houston, a conservative estimate suggests that there ~~over~~ 12,000 potential DS1 loops used by wireless carriers that ~~unless~~ the Commission takes action will not be subject to competition. In other words, Texas wireless ~~carriers~~ and all Texas mobile phone ~~users~~ will suddenly be refused the benefits of the ~~Federal~~ Telecommunications Act and the benefits of competition.
17. In its October 11, letter SWBT proposed that EPGN order the circuits ~~as~~ UNEs but put in an escrow fund the difference between the price of a DS1 UNE loop and the SWBT ~~FCC~~

73 tariff price of a **DSI** special **access** service until **this** dispute is resolved. EPN's experience reflects that it *can* take years to resolve these disputes, especially since **SWBT** usually **appeals** any adverse decision to the **courts**. Currently, the cost difference between a **SWBT** FCC 73 Special **Access DSI** channel termination and a DS1 UNE loop is approximately \$125.00 per month.⁸ With the potential to sell over 12,000 circuits, the overall **cost** per month for the CLEC community could be 1.5 million dollars a month. Even at a conservative **estimate** of EPN obtaining 1/12th of the market share or 1,000 of these circuits, the monthly amount in escrow by EPN would be \$125,000. **This** adds up to 1.5 million dollars a year. Neither EPN nor any other **CLEC** in **this** difficult economic **time** has the revenue to sustain **this type** of requirement. That capital is money that EPN needs to pay for **equipment, services**, as well as to deploy its **own** facilities where it is economically feasible, and other **UNEs** to provide and maintain customer **service**. **When this** amount is added to the **costs** of filing and litigating a complaint with the Commission, it is obvious that the cost of **meeting** SWBT's demands is excessive and anti-competitive. In reality, EPN would still be paying the Special Access charges (which it should not have to do because SWBT is obligated to provide **UNEs**); it's just that SWBT would not receive all of the fees. EPN, however, would still have to suffer the burden of paying the excessive charges **even** though **SWBT** doesn't collect them (and might never). Therefore placing the difference between the Special Access price and the UNE price for

⁸ A **DS1 Channel** termination from SWBT's FCC 73 **Tariff** is **\$180.00** on a month to month basis. A DS1 UNE loop is either approximately **\$44/month** for a DS1 provisioned over HDSL, or **\$76/month** for other DS1 loops.

the DS1 loops ~~into~~ the escrow account would serve to ~~harm~~ EPN with ~~no~~ benefit to SWBT.

18. In addition, SWBT is now **rejecting all** EPN orders for facilities to serve our wireless carrier customer. It appears SWBT now **suspects** every order ~~from~~ EPN for ~~this~~ customer is a cell site. None of these orders, however, were to serve cell sites. ~~This~~ practice is discriminatory, anti-competitive **and raises** a **serious** impediment to EPN's ability to meaningfully compete ~~with~~ **SWBT**.
19. Further affiant sayeth not.

VERIFICATION

I hereby declare that statements in the foregoing Affidavit are true and correct to the best of my knowledge, information and belief. I declare under penalty of perjury that the foregoing is true and correct.

SIGNATURE: Pantios Manias
NAME: Pantios Manias
TITLE: SVP
DATE: 11/13/02

Subscribed and sworn to before me this 13th day of November, 2002.



Ginny Cutbuth
Notary Public

My Commission expires on Sept. 22, 2004

EXHIBIT 4

Diagram of How Wireless Carrier ~~Utilizes~~ Wireline Telecommunications

CURRENT EPN CELL SITE CONFIGURATION

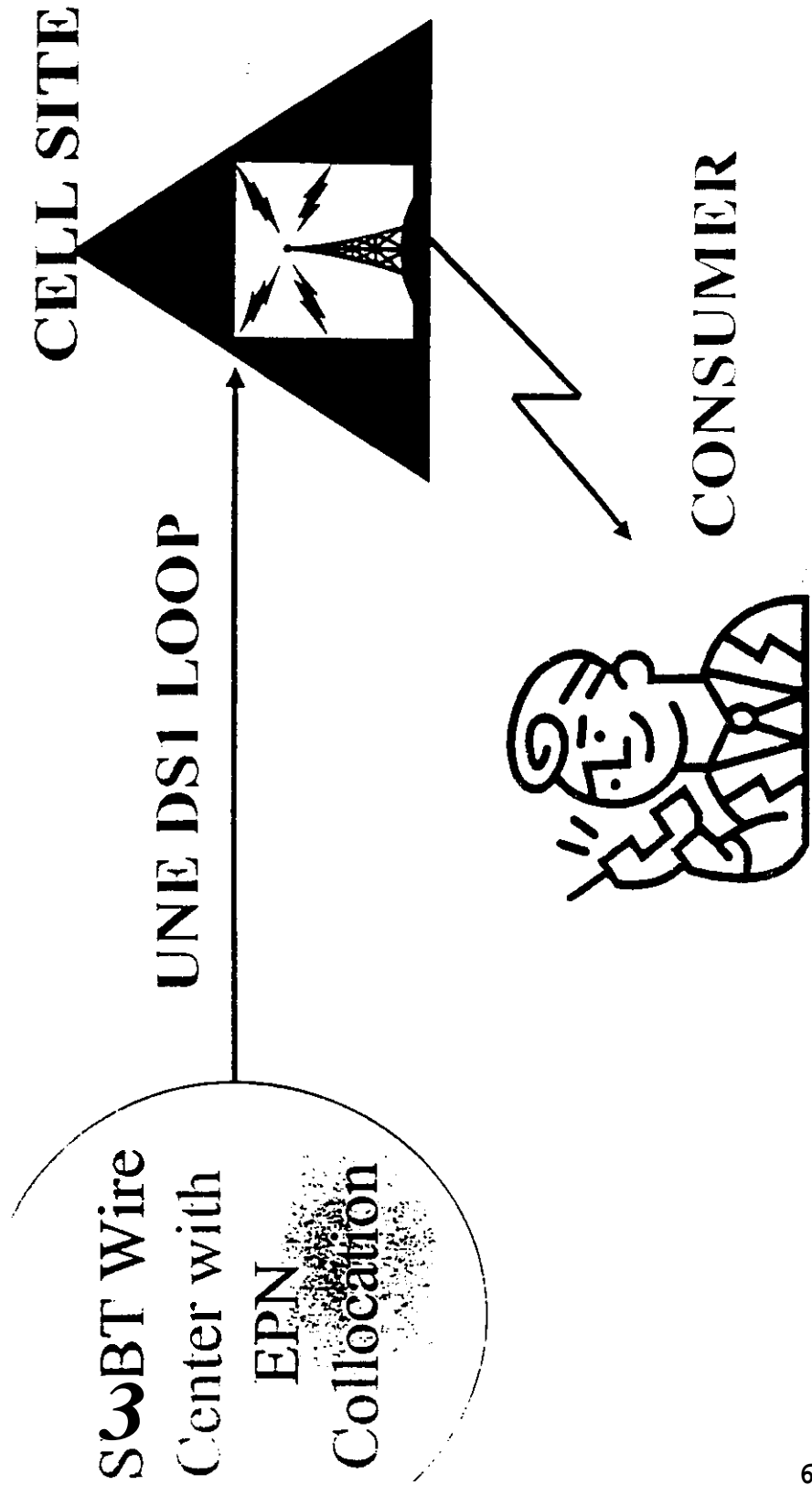


EXHIBIT 5

Verification of Pantios Manias

VERIFICATION

STATE OF TEXAS)
)
)
COUNTY OF HARRIS)

ss.

I, **Pantios Manias**, hereby declare under penalty of perjury, that I am Senior Vice President for Carrier Relations, Regulatory and Business Development for El Paso Global Networks, Inc.; that I am authorized to make this verification on behalf of **El Paso Networks, LLC**, the complainant; that I have read the foregoing **Complaint**; and that the facts stated therein are true and correct to the best of my knowledge, information and belief.

Pc *Pantios Manias*
Manias

Senior Vice Resident for Carrier Relations,
Regulatory and Business Development
El Paso Global Networks, Inc.

Subscribed and sworn to before me this 13th day of November, 2002.



Ginny Cutbuth
Notary Public()

My Commission expires on Sept. 22, 2004.

EXHIBIT 6

**EPN Local Service Request
Purchase Order Number 1ULQ0217**

[Home](#)
[Local Service Request](#)
[End User Information](#)
[Loop Service](#)
[Directory Service Request Form](#)
[Directory Listing](#)
[Directory Service Caption Request Form](#)



Local Service Request

[Administrative Section](#)
[Bill Section](#)
[Contact Section](#)
[End Of Form](#)

Administrative Section

[Next Section](#)
[End of Form](#)

CCNA	PON	VER	LSRND	LOCOTY	HTOTY	AN	ATN	SC
WLR	TUL00217DLSGL							
DISENT	DSPCH	DD	APPTIMEDDD	DDDD	APPTIMEDDD	DEPT		
05-07-2002-0230PM		05-10-2002						
PROJECT	CHC	REXTYP	ACT	SUP	EXP	AFQ	RTR	CC
		AB	N				D	7015
AENG	NNSP	QNSP	ALBR	SCA	AGAUTH			
			Y		Y			
DATED	AUTHNM	PORTTYP	ACTL	AI	APOT	LST	LSD	
05-07-2002			DLLSTX-HA-H	N	01001071101			
TDS	SPEC	NC	PBT	NCI	CHANNEL	SECNCI	RPN	RORD
	UNBLNT	LY-		040B9.11		040U9.1SN		
LSPAUTH	LSPAUTHDATE	LSPAUTHNAME	LSPAN	CIC	CUST	LSP		
SAN								

Bill Section

DSGCON ROOM DSGCON CITY DSGCON STATE DSGCON ZIP

HOUSTON TX 77002

REMARKS

APOT 01991071101

End User Information

[Administrative Section](#)
[Location Access Section](#)
[Inside Wire Section](#)
[Bill Section](#)
[Disconnect Information Section](#)
[End Of Form](#)

Administrative Section

Next Section Previous Section End of Form

DDTY

Location Access Section

Next Section Previous Section End of Form

LOGNUM NAME SAPP SANO SASE SASD
 001 3001 S G
 SASN SATH SASS

Hunt Group Section
 DID Section
 Circuit Detail Section
 Section Section
 Directory Section

Firm Order Confirmation - Reject

Administrative Section

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REJECTTYPE

FATAL

CCNA	PON	YER	AN	ATN	LSRNO				
WLR	TULQ0217DLSGL				20020507L12397-00				
QBD	CNO	INTI	CDTSENT	REP					
			05-08-2002-0621AM						
ST	IBT	REP TELNO	ST	CHC	FDT	DO	EBD	RII	BAN1
			E						
RI2	BAN2	ECVER							

REASON

ERRORCODE ERRORTEXT

ESDD	AFVR	DSGCON	NSPOSGCON	DESIGN TELNO	QNSP	TOTR
LORD	CC	COMDATE				
	7015					

Hunt Group Section

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[Loop Service](#)
[Directory Service Request Form](#)
[Directory Listing](#)
[Directory Service Caption Request Form](#)



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CCNA	PON	VER	LSRNO	LOCOTY	HTOTY	AN	ATN	SC
WLR	1UL00217DLLSGL	05						
DTSENT	DSPICH	DDD	APPTIMEDDO	DDDO	APPTIMEDDDO	DEPT		
05-07-2002-0230PM		06-07-2002						
PROJECT	CHC	REQTYP	ACT	SUP	EXP	AFO	RTR	CC
	AB	N	3				D	7015
CC	AEENG	NNSP	DNSP	ALOR	SCA	AGAUTH		
				Y		Y		
DATER	AUTHNM	PORTYP	ACTL	AI	APDT	LST	LSQ	
05-07-2002			OLLSTXMAH	N	01001071102			
TDS	SPEC	NC	PBT	NCI	CHANNEL	SECNCI	RPON	RORD
	UNBLNT	LY-		040B9.11		04DU9.1SN		
LSPAUTH	LSPAUTHDATE	LSPAUTHNAME	LSPAN	CIC	CUST	LSP		
SAN								

Bill Section

INIT		INIT TELNO		INIT EMAIL	
[REDACTED]		[REDACTED]		[REDACTED]	
INIT FAXNO	INIT STREET	INIT FLOOR	INIT ROOM	INIT CITY	
[REDACTED]	1001 LOUISIANA	25	[REDACTED]	HOUSTON	
INIT STATE	INIT ZIP	IMPCON NAME	IMPCON TELNO	IMPCON PAGER	ALTIMPCON NAME
TX	77002	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
ALTIMPCON TELNO	ALTIMPCON PAGER	DSGCON	DRC	DSGCON TELNO	DSGCON FAXNO
[REDACTED]	[REDACTED]	[REDACTED]	FAX	[REDACTED]	[REDACTED]
DSGCON EMAIL		DSGCON STREET		DSGCON FLOOR	
[REDACTED]		1001 LOUISIANA		25	
DSGCON ROOM	DSGCON CITY	DSGCON STATE	DSGCON ZIP		
[REDACTED]	HOUSTON	TX	77002		
REMARKS					
APOT 01DS1071102...THIS LOCATION IS A CELL SITE SUPP TO CHANGE ADDRESS					

End User Information

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Administrative Section

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DOTY

Location Access Section

☒ Next Section ☒ Previous Section ☒ End of FormLOCNUM NAME SAPR SANO SASE SASD
001 [REDACTED] 3001 SSASN SATH SASS
CENTRAL EXPWY

SADLO

FLOOR ROOM BLDG CITY STATE ZIP
STE D3 MCKINNEY TX 75070

LCOM LCOM TELNO EUMI

ACC

PLEASE CALL AHEAD FOR ACCESS. THIS LOCATION IS A CELL SITE

WSOP CREMER CREMOD ERL INT STREET

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CCNA	PON	VER	LSRNO	LOCQTY	HIQTY	AM	ATN	SC
WLR	1ULQ02303DLLSR	-						
DISSENT	DSPTCH	DDD	APPTIMEDDD	DDDO	APPTIMEDDDO	DFDT		
06-05-2002-1110AM	<input checked="" type="checkbox"/>	06-10-2002						
PROJECT	CHC	REQTYP	ACT	SUP	EXP	AEO	RIR	CC
	<input checked="" type="checkbox"/>	AB	N	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		D	7015
AENG	NNSP	ONSP	ALBR	SCA	AGAUTH			
<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
DATED	AUTHNM	PORTTYP	ACTL	AI	APOT	LST	LSQ	
06-05-2002		<input checked="" type="checkbox"/>	DLLSTXREHE	N	01126020646			
IOS	SPEC	NC	PBT	NCI	CHANNEL	SECNCI	RPON	RORD
	UNBLNT	LY--	<input checked="" type="checkbox"/>	04QB9.11		04DU9.1SN		
LSPAUTH	LSPAUTHDATE	LSPAUTHNAME	LSPAN	CIC	CUST	LSP		
SAN								

Bill Section

../St tusQueryDet il&NF_Field.Ilec=SW &NF_Field.id=1ULQ02280AUSTRA&NF_Field.Ver=&NF_Field.Type=new&NF_Field 6/5/2002

REMARKS

INSTALL NEW UNE DS1.ALT LCON TELNO 469-360-0090

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- Bill Section
- Disconnect Information Section
- End of Form

End User Information

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DOY

Location Access Section

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LOGNUM	001	NAME		SAPR		SANO	3001	SASF		SASD	S
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SASN SATH SASS

CENTRAL EXPWY		
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SADLO

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Circuit Detail Section

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Circuit Detail									
LOCNUM	LNUM	ECCKT	CKR	PORTED	NBR	TER	CFA	DISCNR	TLJ
	001	14.HCRC.200172..SW							
	001		03.HCRU.000581..EPGN						

Home Service Order Completion



Service Order Completion

 Administrative Section
 Circuit Detail Section

Administrative Section

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CCNA	PON	VER	AN	ATN	RDTSENT			
1ULQ02303DLLSR								
EAN	EATN	CD	RT	EBD	TIND TIMEONJOB MTL			
			Z					
MCOST	REP	TELNO						
	MOG MECHANIZ							
REMARKS								
<div style="border: 1px solid black; height: 80px; width: 100%;"></div>								
DD	CC	LSRNQ	ORD	REFNUM	TNS	CDTSENT	COMDATE	
06-10-2002	7015	20020605L08696-00	C838041			06-08-2002-060	06-07-2002	
BAN1	BI1	BAN2	BI2	CHC	DSGCON	EDT	INIT	NPORD
LORD	RTI	DESIGN_TELNO	RNEX	NSPDSGCON		REP_TELNO		

EXHIBIT 7

EPN Local Service Request
Purchase Order Number 1ELQ02226